

Privacy Policy

1. Introduction

Aviation Match Maker, owned and managed by TST HAVACILIK DANISMANLIK VE TIC. LTD. STİ. ("tSt Aviation") is a Global Listing & RFP (Request for Proposal) and Data Platform for Commercial Aviation Professionals. As Aviation Match Maker, we care deeply about the privacy of our members, users and visitors.

This Privacy Policy ("**Policy**") aims to describe the scope of the processing personal information that we collect from visitors to our website, aviationmatchmaker.com ("**Website**"), the purposes and means of the processing of that personal data and provide a better understanding on your rights to update, manage, export, and delete your information. This Policy, unless otherwise indicated, applies to all Aviation Match Maker users, including registered users, members under any category and unregistered visitors (collectively, "**User**" or "**You**"), our Website (collectively, "**Platform**") and to all our services ("**Services**"), where we are acting as a data controller with respect to the personal data of our visitors and users.

2. What Information Do We Collect and Process?

We may collect information related to legal and natural person to make available our Platform and provide our services. When you purchase a membership, sign up for services, log in our Platform, subscribe to our newsletter, use any of our Services, contact us directly by any means, we may collect and process your information such as:

- **Account Information:** When creating an account in our Platform, we collect your personal information including your name, email address, password, phone/mobile number and other account information required to manage your account, as well as any comments, feedback, posts and other content submitted by Users.
- **Personal Information:** Both for account and communication purposes, we collect your name, photograph, billing information, phone number, email address, company name and corporate profile and your job title and any other relevant information required to manage your account.

- **Service Information:** In order to carry out and improve our services in the Platform, we may collect information such as search preferences, search and views history, your Listings and RFPs, Favourite/Viewed Listings & RFPs, news alerts or any request submitted regarding our services. Also, when you request technical support, premium membership, recommendations or testimonials, we may process your name and contact information. Listings and RFPs published by users on the website are matched with the user's email address and remain automatically visible in the user's account. Aviation Match Maker reserves the right to make changes in the use of the Website and Services, and the Listings & RFPs can be made automatically or manually by the User.
- **Usage Information:** For technical purposes, we may collect your IP address, operating system, browser type and cookies, device type, date/time stamp, navigation preferences, language settings, timing and length of visit,
- **Transaction Information:** When you purchase any of our membership or services, you will need to provide us or our payment transaction providers with your credit card information to be used exclusively for the purpose of fulfilling your purchase request. In addition, for billing purposes, we may collect your contact details, registered addresses, tax authority and tax identification number, and any other relevant data required for invoices.
- **Information Received From Third Parties:** We may obtain publicly available information including your name, email, phone number, company name, job title, and other similar information from third party websites, such as, magazines, social media and corporate websites.

3. Why Do We Collect Personal Information?

We may use your personal information for the following purposes:

- To provide, operate, manage, develop, customize, expand and improve our services,
- analytics and product management,
- To update, expand and analyze our records and identify our Users and Users' preferences,

- To create anonymous or aggregated form to analyze ways to improve our website or services
- To provide our Users a continuous customer assistance and technical support,
- To contact our Users with general or personalized service-related notices and notifications, provide information and other communications to you regarding our Website and Services, including promotional emails and marketing information.
- To communicate with our Users regarding any kind of query,
- To maintain aggregated statistical data and/or inferred information, which we may use to provide and improve our respective services;
- To ensure our data security,
- To comply with any relevant applicable laws and regulations.
- To expand our publishing and marketing services, and to undertake advertising campaigns on social media platforms such as LinkedIn, Facebook and X (Twitter).

4. Legal Basis for the Collection and Processing of Personal Information

- **Legitimate Interest:** The legal ground for the collection and processing of data is our legitimate interests, proper administration of our website and services, management of customer relations and ensuring that user login credentials are not shared with an unauthorized person in violation of the terms and conditions.
- **Performance of contract:** We may process personal information in the cases the personal data processing activity is directly related to the establishment or performance of a contract established or already signed with you, such as to create and secure your account, membership or respond to your inquiries or questions related to our services.
- **Consent:** We may collect and process your personal Information in cases where you have consented to the use of your information.
- **Legal Obligation:** We may process personal information to comply with our legal obligation arising from the related laws and regulations, including tax and accounting obligations, and we may process your personal information when necessary to establish, exercise, or defend legal claims, or protect any individual's vital interests.

- **Publicly-known information:** In case the personal information has been disclosed to the public in any way by the data owner, and that has been made available to everyone as a result of making it public, may be processed by Aviation Match Maker, even without the explicit consent of the data owners, limited to the purpose of making it public.

5. Who We Share Personal Information With?

- **Subsidiaries and Affiliated Companies.** We may disclose personal information to any member of our group companies, business partners, subsidiaries and affiliated companies.
- **Third Party Service Providers.** We may share with our service providers, limited to the performance of the services such as payment method solutions, hosting, technical support and maintenance that we receive from them. Especially, we make available your information including name, tax information, billing address, email address, phone number, but not limited to. Please note that in the examples listed above we act as an intermediary platform allowing you to procure the services of such Third Party Services with which you are interacting directly, and at your discretion. In this respect, we act as a service provider to you, disclosing information to the third party services on your behalf. Therefore, we do not control and are not responsible for the actions or policies of any Third Party Service, and your use of any Third Party Service is at your own risk.
- **Authorized Public Institutions.** We may share personal information with public institutions and organizations that are legally authorized to receive information and documents from us.
- **Legal Authorities.** We may disclose personal information to law enforcement authorities, administrative authorities, courts at any grade, regulatory bodies or pursuant to any court or administrative order in order to comply with a legal obligation, to protect the rights or to ensure the compliance of our terms and conditions, security or safety of our Platform, users, visitors, third party providers or the public.

- **Legal Professionals.** We may disclose your personal data to professional advisers insofar as reasonably necessary for the purposes of obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

6. International Transfer of Personal Information

By using our services, you give consent and authorize us to transfer and store your information abroad, for the purposes described in this policy. The privacy and security measures and the rights of authorities to access your personal information in abroad may not be equivalent to those of your home country.

In case we transfer your personal information abroad, we ensure that all the required will be taken to ensure the proper protection for your personal information in compliance with applicable data protection laws. For further information about international transfers of your personal information, please contact us via [ozerk \(at\) aviationmatchmaker.com](mailto:ozerk@aviationmatchmaker.com) or [team \(at\) aviationmatchmaker.com](mailto:team@aviationmatchmaker.com).

7. How Do We Retain and Delete Your Information?

Personal data that we process for any purpose shall not be kept for longer than is necessary for such purpose. Retention periods are determined taking into account the type of information that is collected and the purpose for which it was collected, bearing in mind the requirements applicable to the situation and the need to delete outdated, unused information at the earliest reasonable time. We process, store and retain your personal data as long as you use the service.

Notwithstanding, we may retain your personal data where necessary for compliance with a legal obligation to which we are subject, or in order to protect the vital interests of you or another natural person.

Should the data no longer be required for the fulfilment of contractual or legal obligations or our legitimate interest, we immediately delete such information *ex officio* or upon your request in accordance with the guidelines published by the Turkish Data Protection Agency.

8. Third Party Services

The services we provide via our Platform, may contain links or direct to other websites, apps, platforms or services provided by third parties. Any information you provide on third-party channels is subject to the policies of those service providers, even if accessed through the Services. Aviation Match Maker is not responsible for the the privacy practices or policies of those third parties to which access are provided through our Platform and recommends you to learn about such privacy and security policies before providing any personal information.

9. Amendments

We may change this policy from time to time, and if there is a change, we will notify you of significant changes to this policy by email or through the notification system in our Platform. By continuing to use our Platform after these changes take effect, you agree to the new policy. If the amendments to be made are essential, we may provide a more prominent notice or request your consent as required by applicable law.

10. Your Rights

As a data owner, you have the following rights as provided under applicable law:

- Right to request information about the scope of our processing activity.
- Right to request to have your incomplete or incorrect information corrected, updated or completed, or to have your information deleted or anonymized.
- Right to request notification of the actions taken in accordance with your rights in the form of correction, deletion and destruction mentioned above, to third parties to whom personal data has been transferred.
- Right to object to or restrict processing other than for storage purposes.
- Right to withdraw consent previously provided.
- Right to receive personal information that we retain about you or to request that we transfer such information to a third party.
- Right to file a complaint before Turkish Data Protection Agency.

You may exercise any of your rights in relation to your personal data by written notice to us via the contacts written below, or you can also opt to submit a request to delete all your personal

information by submitting an email to ozerk (at) aviationmatchmaker.com or team (at) aviationmatchmaker.com. We take every privacy request or complaint seriously and make all reasonable efforts to resolve your complaint promptly and in accordance with applicable law. In such cases, once we receive and verify your request, we will delete promptly your personal information from our records unless an exception applies under applicable law.

11. About cookies

There are two categories of cookies we may use:

- Essential Cookies, which are necessary for proper function of our Platform and cannot be switched off totally. You may modify the settings of your browser to block these cookies, however, some parts of the Platform will not work properly.
- Analytics cookies, which are used for internal analytics and include cookies from providers such as Google Analytics, to provide statistics on how our Platform is used, improve the website by identifying any errors.

12. Contact

If you have any questions, comments or queries about this Policy, or if you would like to exercise your rights with respect to your personal information, you can contact us by submitting an email to ozerk (at) aviationmatchmaker.com or team (at) aviationmatchmaker.com or mail from Yesilkoy Mah. Ataturk Cad. EGS Business Park, B2 Blok, Kno:12, Dno:1, Bakirkoy, 34149, Istanbul, Turkiye.